

**Before the  
Federal Communications Commission  
Washington D.C. 20554**

In the Matter of	)	
	)	
Advanced Television Systems	)	MB Docket No. 87-268
And Their Impact on the	)	
Existing Television Broadcast	)	
Service	)	

To: The Commission

**PETITION FOR RECONSIDERATION**

WWBT, Inc. hereby submits this Petition for Reconsideration of the Seventh Report and Order in the above referenced proceeding<sup>1</sup> to request that the Commission modify the DTV Table of Allotments (“*Appendix B*”)<sup>2</sup> with respect to WWBT(TV), Richmond, VA (Fac. ID No. 30833).

WWBT(TV) operates on NTSC channel 12 and out-of-core DTV Channel 54. The station has elected to return to its analog channel 12 for post-transition operation, and this election has been approved by the Commission.<sup>3</sup> The station plans to use its existing non-directional channel 12 antenna for post-transition DTV operation. WWBT(TV) always has intended to match the 36 dBu noise-limited service contour of its post-transition DTV facility to the station’s analog Grade B contour – that is, to operate a post-transition DTV facility that truly replicates the station’s current analog facility coverage

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<sup>1</sup> *Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking, FCC 07-138 (rel. Aug. 6, 2007).

<sup>2</sup> *Id.* at Appendix B.

<sup>3</sup> *See* FCC File No. BFRCT-20050812AND.

footprint. However, like many VHF stations with companion channel UHF assignments that elected to return to their analog VHF channel for post-transition operation, WWBT(TV) will be unable to build a DTV facility that truly replicates the station's analog Grade B contour without exceeding its allotted digital power. This is because, when originally determining WWBT(TV)'s DTV companion channel allotment (and the companion channel allotments for other UHF stations), the Commission limited effective radiated power ("ERP") to 1 megawatt, even though this power level is insufficient to permit true replication of the station's analog coverage contour.

Now, when WWBT(TV) seeks a construction permit for post-transition DTV operations on channel 12, the Commission's engineering methods will cap the allowed ERP based on the companion channel 54 limited 1 megawatt UHF digital contour as specified in *Appendix B*, not the station's larger analog Grade B contour. As a result, the post-transition contour of WWBT-DT will be significantly smaller than the station's current analog Grade B contour. Specifically, the facilities specified in *Appendix B* for the station cover 3960 km<sup>2</sup> less land area than is covered by the station's current analog Grade B service contour.<sup>4</sup> Similarly, the *Appendix B* facilities serve approximately 192,000 fewer people than are served by the station's current analog Grade B service contour. Such a drastic reduction in over-the-air service falls well short of the station's goal of truly replicating its analog Grade B contour and surely does not serve the public interest. In order to provide service to the same area and population currently served by the station's analog Grade B contour, WWBT-DT will need to operate its post-transition

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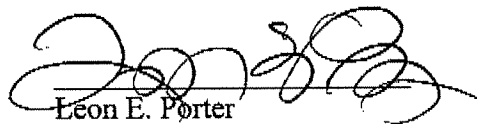
<sup>4</sup> For further detail concerning the technical matters referenced herein, please refer to the attached map, which was prepared by Richard Mertz, WWBT, Inc.'s technical consultant.

digital facilities with an ERP of 12.1 kW. Accordingly, WWBT, Inc. respectfully requests that the Commission modify the DTV Table of Allotments for WWBT(TV) to specify this increased power.

Respectfully submitted,

WWBT, INC.

by

A handwritten signature in black ink, appearing to read "Leon E. Porter", is written over a horizontal line.

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Dated: October 26, 2007

